

1 Rory Reid  
Nevada Bar No. 3797  
2 I. Scott Bogatz  
Nevada Bar No. 3367  
3 Kerry E. Kleiman  
Nevada Bar No. 14071  
4 REID RUBINSTEIN & BOGATZ  
Bank of America Plaza  
5 300 South 4th Street, Suite 830  
Las Vegas, NV 89101  
6 Telephone: (702) 776-7000  
Facsimile: (702) 776-7900  
7 rreid@rrblf.com  
sbogatz@rrblf.com  
8 kkleiman@rrblf.com

9 Bryan A. Merryman (*Pro Hac Vice*)  
Catherine S. Simonsen (*Pro Hac Vice*)  
10 WHITE & CASE LLP  
555 S. Flower Street, Suite 2700  
11 Los Angeles, CA 90071-2433  
Telephone: (213) 620-7700  
12 Facsimile: (213) 452-2329  
bmerryman@whitecase.com  
13 catherine.simonsen@whitecase.com

14 Claire DeLelle (*Pro Hac Vice*)  
Celia McLaughlin (*Pro Hac Vice*)  
15 WHITE & CASE LLP  
701 Thirteenth Street, NW  
16 Washington, DC 20005-3807  
Telephone: (202) 626-3600  
17 Facsimile: (202) 639-9355  
claire.delelle@whitecase.com  
18 cmclaughlin@whitecase.com

19 *Attorneys for Plaintiff*  
20 *V5 Technologies, LLC, d/b/a Cobalt Data Centers*

21 UNITED STATES DISTRICT COURT

22 DISTRICT OF NEVADA

23 V5 TECHNOLOGIES, LLC, d/b/a  
COBALT DATA CENTERS,

24 Plaintiff,

25 v.

26 SWITCH, LTD., et al.,

27 Defendants.  
28

Case No. 2:17-cv-02349-KJD-NJK

**STIPULATION TO EXTEND  
DEADLINE TO FILE OPPOSITION  
TO MOTION TO STRIKE (ECF NO.  
176)**

1 Pursuant to Federal Rule of Civil Procedure 6(b)(1), plaintiff V5 Technologies, LLC,  
2 d/b/a/ Cobalt Data Centers (“Cobalt”) and defendant Switch, Ltd. (“Switch”), by and through  
3 their counsel, hereby submit the following stipulation and proposed order to extend the deadline  
4 for Cobalt to respond to Switch’s Motion to Strike Everett Thompson (ECF No. 176) from  
5 February 18, 2020 to February 28, 2020:

6 WHEREAS after a meet and confer occurred on February 3, 2020 (the “Meet and  
7 Confer”), Switch filed a Motion to Strike Everett Thompson (ECF No. 176) on February 4, 2020;

8 WHEREAS pursuant to Local Rule 7-2(b), the deadline for Cobalt to file its opposition to  
9 Switch’s Motion is February 18, 2020;

10 WHEREAS between the date of the filing of Switch’s Motion and the date Cobalt’s  
11 opposition to the Motion is due, the parties are scheduled for six expert depositions, and the  
12 parties are preparing Daubert motions and summary judgment motions for a February 24, 2020  
13 filing deadline;

14 WHEREAS the parties agreed as part of the Meet and Confer that under these  
15 circumstances, good cause exists to give Cobalt additional time to prepare its opposition to the  
16 Motion;

17 WHEREAS no other deadlines nor the case schedule in general will be impacted by  
18 giving Cobalt 10 additional days to respond to Switch’s Motion;

19 THEREFORE, the parties respectfully submit that good cause exists for, and request that  
20 the Court enter, an order extending the deadline for Cobalt to file its opposition to Switch’s  
21 Motion to Strike Everett Thompson (ECF No. 176) to February 28, 2020.

22 Dated: February 4, 2020

23 By: Rory Reid  
24 Rory Reid (Nevada Bar No. 3797)  
25 I. Scott Bogatz (Nevada Bar No. 3367)  
26 Kerry E. Kleiman (Nevada Bar No. 14071)  
27 **REID RUBINSTEIN & BOGATZ**  
28 Bank of America Plaza  
300 South 4th Street, Suite 830  
Las Vegas, NV 89101  
Telephone: (702) 776-7000  
Facsimile: (702) 776-7900

1 rreid@rrblf.com  
2 sbogatz@rrblf.com  
3 kkleiman@rrblf.com

4 Bryan A. Merryman (*Pro Hac Vice*)  
5 Catherine Simonsen (*Pro Hac Vice*)  
6 **WHITE & CASE LLP**  
7 555 S. Flower Street, Suite 2700  
8 Los Angeles, CA 90071-2433  
9 Telephone: (213) 620-7700  
10 Facsimile: (213) 452-2329  
11 bmerryman@whitecase.com  
12 catherine.simonsen@whitecase.com

13 Claire DeLelle (*Pro Hac Vice*)  
14 Celia McLaughlin (*Pro Hac Vice*)  
15 **WHITE & CASE LLP**  
16 701 Thirteenth Street, NW  
17 Washington, DC 20005-3807  
18 Telephone: (202) 626-3600  
19 Facsimile: (202) 639-9355  
20 claire.delelle@whitecase.com  
21 cmclaughlin@whitecase.com

22 Attorneys for Plaintiff  
23 V5 TECHNOLOGIES, LLC, d/b/a COBALT  
24 DATA CENTERS

25 Dated: February 4, 2020

26 By: Jacob A. Reynolds  
27 Mark Hutchison (Nevada Bar No. 4639)  
28 Jacob A. Reynolds (Nevada Bar No. 10199)  
Cynthia Milanowski (Nevada Bar No. 5652)  
Chad Harrison (Nevada Bar No. 13888)  
HUTCHISON & STEFFEN, PLLC  
Peccole Professional Park  
10080 West Alta Drive, Suite 200  
Las Vegas, Nevada 89145  
Telephone: (702) 385-2500  
Facsimile: (702) 385-2086  
mhutchison@hutchlegal.com  
jreynolds@hutchlegal.com  
cmilanowski@hutchlegal.com  
charrison@hutchlegal.com

David A. Higbee (*Pro Hac Vice*)  
Djordje Petkoski (*Pro Hac Vice*)  
SHEARMAN & STERLING LLP  
Shearman & Sterling LLP  
401 9th Street NW, Ste 800

1 Washington, D.C. 20004  
2 Telephone: (202) 508-8000  
3 david.higbee@shearman.com  
4 djordje.petkoski@shearman.com

5 Samuel Castor (Nevada Bar No. 11532)  
6 Anne-Marie Birk (Nevada Bar No. 12330)  
7 **SWITCH, LTD.**  
8 7135 S. Decatur Blvd.  
9 Las Vegas, NV 89118  
10 Telephone: (702)-444-4102  
11 sam@switch.com  
12 abirk@switch.com

13 Attorneys for Defendant  
14 SWITCH, LTD.

15 **IT IS SO ORDERED.**

16   
17 \_\_\_\_\_  
18 United States Magistrate Judge

19 DATED: February 6, 2020  
20  
21  
22  
23  
24  
25  
26  
27  
28